

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

NATHAN ROBERTS and FREEDOM
TRUCK DISPATCH LLC, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

PROGRESSIVE PREFERRED INSURANCE
COMPANY; PROGRESSIVE CASUALTY
INSURANCE COMPANY; CIRCULAR
BOARD LLC,

Defendants.

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN
Magistrate Judge James E. Grimes, Jr.

**MOTION FOR THE ADMISSION,
PRO HAC VICE, OF JENNIFER VAIL
AS COUNSEL FOR *AMICI CURIAE***

Pursuant to Local Civil Rule 83.5(h), I hereby move for the admission, *pro hac vice*, of Jennifer Vail, an attorney at the Southern Poverty Law Center located at 1101 17th Street NW, Suite 705, Washington, D.C. 20036, and a member in good standing of the District of Columbia bar (D.C. Bar No. 90004758, admitted on October 31, 2022), as counsel in this case for *Amici Curiae* the Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice. I have never been disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States. I have never received a reprimand from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar. A Certificate of Good Standing is filed herewith.

Date: December 21, 2023

Respectfully submitted,

s/ Jennifer Vail

Jennifer Vail (DC Bar No. 90004758)
SOUTHERN POVERTY LAW CENTER
1101 17th Street NW, Suite 705
Washington, D.C. 20036
Tel: (201) 469-6455
Fax: (404) 221-5857
Email: jennifer.vail@splcenter.org

CERTIFICATE OF SERVICE

I certify that, on December 21, 2023, I electronically transmitted the attached MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF JENNIFER VAIL AS COUNSEL FOR *AMICI CURIAE*, its accompanying Certificate of Good Standing, and proposed order using the CM/ECF system. Notice of Electronic Filing will be sent to all CM/ECF registrants for this matter.

Respectfully submitted,

s/ Jennifer Vail

Jennifer Vail (D.C. Bar No. 90004758)
SOUTHERN POVERTY LAW CENTER
1101 17th Street NW, Suite 705
Washington, D.C. 20036
Tel: (201) 469-6455
Fax: (404) 221-5857
Email: jennifer.vail@splcenter.org

*Attorney for Amici Curiae The Southern Poverty
Law Center, Hispanic National Bar Association,
and Asian Americans Advancing Justice – AAJC*